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18 REED, and COASTAL PROTECTION  
RANGERS, INC.  
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20 **UNITED STATES DISTRICT COURT**  
21 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**  
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23 CORY SPENCER, an individual;  
24 DIANA MILENA REED, an  
individual; and COASTAL  
25 PROTECTION RANGERS, INC., a  
26 California non-profit public benefit  
corporation,  
27

28 Plaintiffs,

CASE NO. 2:16-cv-02129-SJO (RAOx)

**PLAINTIFFS' OBJECTIONS TO  
DEFENDANT FRANK FERRARA'S  
EVIDENCE IN SUPPORT OF  
MOTION FOR SUMMARY  
JUDGMENT, OR IN THE  
ALTERNATIVE FOR SUMMARY  
ADJUDICATION OF CLAIMS**

Case No. 2:16-cv-02129-SJO (RAOx)

PLTFS.' OBJECTIONS TO DEFT. FRANK FERRARA'S EVIDENCE IN SUPPORT OF MOTION FOR SUMMARY  
JUDGMENT, OR IN THE ALTERNATIVE FOR SUMMARY ADJUDICATION OF CLAIMS

v.

LUNADA BAY BOYS; THE  
INDIVIDUAL MEMBERS OF THE  
LUNADA BAY BOYS, including but  
not limited to SANG LEE, BRANT  
BLAKEMAN, ALAN JOHNSTON  
AKA JALIAN JOHNSTON,  
MICHAEL RAE PAPAYANS,  
ANGELO FERRARA, FRANK  
FERRARA, CHARLIE FERRARA,  
and N. F.; CITY OF PALOS VERDES  
ESTATES; CHIEF OF POLICE JEFF  
KEPLEY, in his representative  
capacity; and DOES 1-10,

Defendants.

Judge: Hon. S. James Otero  
Date: September 5, 2017  
Time: 10:00 a.m.  
Crtrm.: 10C

Complaint Filed: March 29, 2016  
Trial Date: November 7, 2017

Plaintiffs Cory Spencer, Diana Milena Reed and Coastal Protection Rangers, Inc. (collectively referred to as "Plaintiffs") hereby object to the following evidence presented by Defendant Frank Ferrara ("Defendant") in connection with Defendant's Motion for Summary Judgment or, in the Alternative, Summary Adjudication set for hearing on September 5, 2017, before this Court:

**A. Objections To Exhibit O (Deposition of Kenneth Claypool) to The Declaration Of Tiffany Bacon In Support Of Frank Ferrara's Motion For Summary Judgment Or, In The Alternative, Partial Summary Judgment.**

<u>Evidence:</u>	<u>Objections:</u>
1. Q: Would you classify Frank Ferrara as one of the Lunada Bay Boys? A: Not the father or Angelo's dad. Claypool Dep. at 88:3-88:7.	1. This evidence is inadmissible because Mr. Claypool has not stated facts to establish that he has personal knowledge of the names, characteristics, or current members of the Lunada Bay Boys to say

<u>Evidence:</u>	<u>Objections:</u>
	whether Mr. Ferrara should also be classified as a Lunada Bay Boy. FRE 602. As a result, his testimony in the form of an opinion is inadmissible. FRE 701.

**B. Objection to Exhibit P (Declaration of Jim Russi) to The Declaration Of Tiffany Bacon In Support Of Frank Ferrara's Motion For Summary Judgment Or, In The Alternative, Partial Summary Judgment.**

<u>Evidence:</u>	<u>Objections:</u>
2. (9) I have no knowledge of Frank Ferrara being involved in any surf related incidents at or around Lunada Bay.  (10) I have no knowledge of Frank Ferrara being involved in any incident of vandalism, harassment, intimidation or threatening behavior at or near Lunada Bay, nor any other wrongful behavior.  Russi Decl. at 2:17-21.	2. This testimony is inadmissible because it is irrelevant. FRE 402. Additionally, this testimony is inadmissible because the witness lacks personal knowledge. FRE 602. Talking to Frank Ferrara "approximately 2-3 times per year" ( <i>see</i> Russi Decl. at 2:6-7) does not demonstrate that Mr. Russi has any basis to know whether Frank Ferrara was involved in any surf related incidents at or around Lunada Bay, or whether Frank Ferrara was involved in any incident of vandalism, harassment, intimidation or threatening behavior, or any other wrongful behavior.

1 DATED: August 7, 2017

HANSON BRIDGETT LLP

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4 By: /s/ Samantha Wolff

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